

**UNITED STATES BANKRUPTCY COURT  
WESTERN DISTRICT OF VIRGINIA**

IN RE: Richard S Erb  
Heidi L Brennan-Erb  
Debtor(s)

CHAPTER 13  
CASE NO. 17-60676

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Roundpoint Mortgage Servicing  
Corporation

Movant

v.

Richard S Erb  
Heidi L Brennan-Erb  
Respondent(s)

**ANSWER TO MOTION FOR RELIEF FROM AUTOMATIC STAY**

Comes now the Debtor, by counsel and answers the movants' motion as follows:

1. Debtors admit the allegations contained in paragraphs 1, 2, 3, 4, 5, 6 and 11 of the movants' motion.
2. Debtor(s) can neither admit or deny the allegations contained in paragraph(s) 8 and 9 because the Movant has not supplied a current pay history in order to verify the accuracy of the figures alleged.
3. Debtor(s) can neither admit or deny the allegations contained in paragraph(s) 7 because the Movant has not supplied a current pay off statement in order to verify the accuracy of the figures alleged.
4. Debtors deny the allegations contained in paragraph 10 because legal fees are exorbitant and unreasonable.
5. Debtors deny the allegations contained in paragraph 12 and 13 demands strict proof thereof.

Wherefore the Debtor(s), moves that the motion to lift stay be denied, that the Movant provide strict proof of the delinquency claims.

Dated: 02/14/2020

Richard S Erb  
Heidi L Brennan-Erb  
By: /s/ Stephen E. Dunn, Esq.

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#### CERTIFICATE OF SERVICE

I certify that a copy of the preceding answer has been served via ECF to attorney for the creditor on this *14th day of February, 2020.*

/s/ Stephen E. Dunn, Esq.